



SATELLITE INDUSTRY ASSOCIATION
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Alexandria, VA 22314

May 31, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: ET Docket 01-278, Part 15 Proceeding on Radar Detector Interference

Dear Ms. Dortch:

The various comments in the Part 15 Proceeding demonstrate the need for a limit on emissions from radar detectors. Radar detector interference has caused, and will continue to cause, debilitating interference and severe harm to the owners and operators of licensed Ku-band networks, unless the Commission implements rules to limit emissions from the radar detectors. Therefore, Satellite Industry Association ("SIA") urges the Commission to enact rules immediately imposing limits on these devices.

SIA members have coordinated further testing and studies on radar detector interference and has refined its proposal for an emissions limit that will adequately protect Ku-band earth stations. Attached hereto are the following:

- Attachment 1 is an analysis supporting the revised limit of 85 uV/meter at a distance of 3 meters. This limit represents a reconciliation of the various proposals made by the satellite industry in their comments in this proceeding, taking into account further testing.
- Attachment 2 presents a survey of VSAT antenna installations and the distance from a radar detector. Based on this survey, the unified proposal in Attachment 1 reflects an assumed minimum distance of 5 meters between VSATs and the interfering radar detector.
- Attachment 3 contains proposed amendments to the rules in Parts 2 and 15, incorporating the proposed limit and a recommendation for certification procedures for radar detector compliance.

In the proposed Part 15 rules in Attachment 3, SIA recommends that the current exemption for radar detectors from Part 15 technical rules be eliminated because the satellite industry has demonstrated the debilitating interference caused by these devices. The serious

nature of the interference and the frequency with which the interference events are occurring necessitate regulation of the manufacturing and importing of these devices. The non-interference requirement imposed on *operators* of the device is insufficient to protect licensed Ku-band earth stations. The manufacturing and importing of these devices must be regulated.

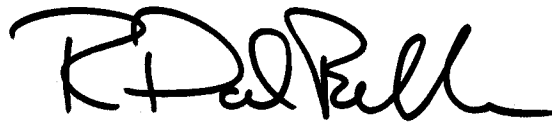
Our proposed amendments to the Part 15 rules also include a definition of a radar detector and a recommendation for certification procedures for equipment authorization. Due to the high levels of radio frequency energy that radar detectors currently emit and the severity of the problems caused by the interference, the Commission should implement a certification authorization procedure that allows it to scrutinize compliance by manufacturers and importers. Further, the Commission should not allow certification of radar detectors by Telecommunications Certification Bodies ("TCBs"). Therefore, we propose an amendment to Part 2 of the rules to except certification of radar detectors from the scope of the TCBs' duties.

Finally, SIA recommends a provision incorporating a limit of 85 uV/meter at a distance of 3 meters in the frequency range of 10.7-12.7 GHz in order to adequately protect Ku-band earth stations from harmful interference by radar detectors. Some radar detector manufacturers have already begun marketing and selling a new line of radar detectors that sweeps across the Ku-band uplink frequency as well. Therefore, in order to provide a minimum level of protection from radar detector interference in other frequency ranges, the current Part 15 emission limits above 30 MHz should also apply to radar detectors.

SIA urges the Commission to make these rules effective immediately upon publication in the Federal Register. Due to the severe harm caused by radar detector interference into licensed Ku-band earth stations, the egregiously high levels of emissions above limits imposed on other devices, and the wanton disregard for good engineering practices, the Commission has good cause for expediting the effective date of these rules.

Pursuant to the Commission's rules on *ex parte* filings, we are filing this letter and the attachments in the record of the above-referenced proceeding. Please contact me at (703) 739-8357 if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R DalBello", with a stylized, cursive script.

Richard DalBello
Executive Director
Satellite Industry Association

Enclosures

cc: Julius Knapp
Geraldine Matise
Ira Keltz
Alan Scrim
Robert Nelson